

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**In re: City of Detroit, Michigan,  
  
Debtor.**

**Chapter 9  
Case No. 13-53846  
Hon. Steven W. Rhodes**

**NON-PARTY MACOMB COUNTY'S RESPONSE TO WAYNE COUNTY'S  
MOTION FOR APPOINTMENT OF FACILITATIVE MEDIATOR**

In accordance with the court's April 11, 2014, order (Dkt #3971) directing a response to Wayne County's motion seeking appointment of a facilitative mediator to address the future of the Detroit Department of Water and Sewerage (Dkt #3945), the County of Macomb hereby responds, through counsel, as follows.

The County of Macomb has negotiated in good faith regarding the City of Detroit Emergency Financial Manager's proposed Regional Water Authority, to the extent such were made possible considering the City's failure to timely and forthrightly provide information and data necessary to the County's due diligence obligations to its residents, businesses, and rate payers. At this point in time, mediation of the issue would not be fruitful in any realistic or meaningful manner, and would constitute only a waste of time, effort, and resources.

Respectfully submitted,

/s/Jill K. Smith (P35390)

Jill K. Smith

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Dated: April 15, 2014

I hereby certify that on 14 April 2014, I electronically filed the foregoing paper with the Clerk of the Court using the ECF filing system which will forward notification of such filing to the following: all counsel of record; I further certify that I have caused the paper to be sent by United States Postal Service mail to the following non ECF participants: none.